

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: APPROACH RESOURCES INC., et al., Debtors.¹	§ § § § § § §	CHAPTER 11 CASE NO. 19-36444 (MI) (Jointly Administered)
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**NOTICE OF AGENDA FOR HEARING SCHEDULED
FOR DECEMBER 13, 2019 AT 1:30 PM (PREVAILING CENTRAL TIME)**

Approach Resources Inc. and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”), file this agenda for matters set for hearing on December 13, 2019 at 1:30 p.m. (prevailing Central Time).

- 1. Cash Management Motion.** *Emergency Motion for Interim and Final Orders (i) Authorizing Debtors to (a) Continue Existing Cash Management System, (b) Honor Certain Related Obligations, (c) Continue Intercompany Arrangements, (d) Maintain Existing Bank Accounts and Business Forms, and (e) Continue Corporate Card Programs; (ii) Waiving Requirements of 11 U.S.C. § 345(b); and (iii) Granting Related Relief [Dkt. No. 4].*

Responses:

- i.** None.

Related Documents:

- i. Interim Order:** Interim Order (i) Authorizing Debtors to (a) Continue Existing Cash Management System, (b) Honor Certain Related Obligations, (c) Continue Intercompany Arrangements, (d) Maintain Existing Bank Accounts and Business Forms, and (e) Continue Corporate Card Programs;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Approach Resources Inc. (4817); Approach Midstream Holdings LLC (4122); Approach Oil & Gas Inc. (7957); Approach Operating, LLC (1981); Approach Delaware, LLC (7483); Approach Services, LLC (3806); and Approach Resources I, LP (5316). The Debtors’ mailing address is One Ridgmar Centre, 6500 West Freeway, Suite 800, Fort Worth, Texas 76116.

(ii) Waiving Requirements of 11 U.S.C. § 345(b); and (iii) Granting Related Relief [Dkt. No. 25];

- ii. **Proposed Revised Final Order:** Final Order (i) Authorizing Debtors to (a) Continue Existing Cash Management System, (b) Honor Certain Related Obligations, (c) Continue Intercompany Arrangements, (d) Maintain Existing Bank Accounts and Business Forms, and (e) Continue Corporate Card Programs; (ii) Waiving Requirements of 11 U.S.C. § 345(b); and (iii) Granting Related Relief [Dkt. No. 101].

Status: This matter is going forward.

2. **Net Operating Loss Motion.** *Emergency Motion of Debtors for Interim and Final Orders (I) Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, Debtors and (II) Granting Related Relief* [Dkt. No. 6].

Responses:

- i. None.

Related Documents:

- i. **Interim Order:** Interim Order (i) Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, Debtors and (ii) Granting Related Relief [Dkt. No. 38];
- ii. **Proposed Revised Final Order:** Final Order (i) Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, the Debtors and (ii) Granting Related Relief [Dkt. No. 103].

Status: This matter is going forward.

3. **Insurance Motion.** *Emergency Motion for Interim and Final Orders (i) Authorizing Debtors to Continue Their Insurance Programs and Pay All Obligations With Respect Thereto; (ii) Granting Relief From Automatic Stay With Respect Workers Compensation Claims; (iii) Directing Financial Institutions to Honor and Pay All Related Checks Presented and Fund Transfer Requests; and (iv) Granting Related Relief* [Dkt. No. 9].

Responses:

- i. None.

Related Documents:

- i. **Interim Order:** Interim Order (i) Authorizing Debtors to Continue Their Insurance Programs and Pay All Obligations With Respect Thereto; (ii) Granting Relief From Automatic Stay With Respect Workers Compensation Claims; (iii) Directing Financial Institutions to Honor and Pay All Related Checks Presented and Fund Transfer Requests; and (iv) Granting Related Relief [Dkt. No. 29];
- ii. **Proposed Revised Final Order:** Final Order (i) Authorizing Debtors to Continue Their Insurance Programs and Pay All Obligations With Respect Thereto; (ii) Granting Relief From Automatic Stay With Respect to Workers' Compensation Claims; (iii) Directing Financial Institutions to Honor and Pay All Related Checks Presented and Fund Transfer Requests; and (iv) Granting Related Relief [Dkt. No. 102].

Status: This matter is going forward.

4. **DIP/Cash Collateral Motion.** *Emergency Motion for Interim and Final Orders (i) Authorizing Limited Use of Cash Collateral on an Interim Basis; (ii) Obtaining Postpetition Credit Secured by Senior Liens Upon Entry of the Final Order; (iii) Granting Adequate Protection; (iv) Scheduling a Final Hearing; and (v) Granting Related Relief [Dkt. No. 14].*

Responses:

- i. **Limestone County Objection:** *The County Of Limestone, Texas' Objection To Debtors' Emergency Motion Of Debtors For Entry Of Orders (i) Authorizing Limited Use Of Cash Collateral On An Interim Basis; (ii) Obtaining Postpetition Credit Secured By Senior Liens Upon Entry Of A Final Order; (iii) Granting Adequate Protection; (iv) Scheduling A Final Hearing; And (v) Granting Related Relief [Dkt. No. 84].*

- a) Objection resolved by inclusion of requested language.

Related Documents:

- i. **Interim Order:** Interim Order (i) Authorizing the Debtors to Use Cash Collateral, (ii) Granting Adequate Protection, (iii) Modifying the Automatic Stay, (iv) Scheduling a Final Hearing, and (v) Granting Related Relief [Dkt. No. 32];
- ii. **Proposed Revised Final Order:** Remains subject to negotiation.

Status: This matter is going forward.

Dated: December 12, 2019
Houston, Texas

Respectfully submitted,

THOMPSON & KNIGHT LLP

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**PROPOSED COUNSEL FOR DEBTORS
AND DEBTORS IN POSSESSION**

Certificate of Service

I certify on December 12, 2019, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ David M. Bennett

David M. Bennett